

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

VALUTA CORPORATION, INC., and
PAYAN’S FUEL CENTER, INC.,

Plaintiffs,

v.

FINANCIAL CRIMES ENFORCEMENT
NETWORK, *et al.*,

Defendants.

Civil Case No. 3:25-cv-00191-LS

**PLAINTIFFS’ SUPPLEMENT TO RECORD AND INDEX OF RECORD
FOR APPLICATION FOR TEMPORARY RESTRAINING ORDER**

Description	Location
Orders, Transcripts, and Amicus Brief	
Order Granting Plaintiffs’ Motion for a Preliminary Injunction in <i>Texas Association for Money Services Businesses v. Bondi</i> , 5:25-cv-00344 (W.D. Tex.) (“ <i>TAMSB</i> ”)	ECF 5-8
Order Granting Plaintiffs’ Motion for a Preliminary Injunction in <i>Novedades y Servicios, Inc. v. Financial Crimes Enforcement Network</i> , No. 3:25-cv-00886-JLS, (S.D. Cal) (“ <i>Novedades</i> ”)	ECF 5-9
Transcript of Hearing on Plaintiffs’ Motion for a Preliminary Injunction in <i>TAMSB</i>	ECF 5-16
Transcript of Hearing on Plaintiffs’ Motion for a Preliminary Injunction in <i>Novedades</i>	ECF 23-1
Brief of Amicus Curiae Money Services Business Association, Inc. and accompanying declarations in <i>Novedades</i>	ECF 17-2
Advisory issued by Judge Biery in <i>TAMSB</i>	ECF 17-1
Exhibits	
Challenged Geographic Targeting Order	ECF 5-5
FinCEN March XX, 2025 Internal Memorandum	ECF 5-6
Public Administrative Record	ECF 15-3

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Declaration of Andres Payan, Jr., in Support of Plaintiffs' Motion for a Temporary Restraining Order	ECF 5-3
Amended Declaration of Arnolando Gonzalez, Jr. in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>TAMSB</i>	ECF 23-2
Declaration of Efrain Salinas in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>TAMSB</i>	ECF 23-3
Declaration of Mario Regalado in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>TAMSB</i>	ECF 23-4
Declaration of Miguel A. Espinoza in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>TAMSB</i>	ECF 23-5
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Declaration of Edelmiro A. Martinez in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>TAMSB</i>	ECF 23-9
Declaration of Edelmiro J. Martinez in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>TAMSB</i>	ECF 23-10
Declaration of David Delgado in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>TAMSB</i>	ECF 23-11

Description	Location
Declaration of Arnoldo Gonzalez, Jr. in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>Novedades</i>	ECF 23-12
Declaration of Esperanza Gomez in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>Novedades</i>	ECF 23-13
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Declaration of Anuar Contreras in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>Novedades</i>	ECF 23-15
Declaration of Mariceli Castro in Support of Plaintiffs' Motion for a Preliminary Injunction in <i>Novedades</i>	ECF 23-16

Dated: June 12, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on June 12, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will provide electronic service upon all attorneys of record.

/s/ Andrew K. Ward
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